1 2 3 4 5	LAW OFFICES OF DALE K. GALIPO Dale K. Galipo, Esq. (Bar No. 144074) dalekgalipo@yahoo.com Hang D. Le, Esq. (Bar No. 293450) hlee@galipolaw.com 21800 Burbank Boulevard, Suite 310 Woodland Hills, California, 91367 Telephone: (818) 347-3333 Facsimile: (818) 347-4118)	
6 7	Attorneys for Plaintiffs L.C., I.H., A.L., and Antonia Salas Ubald	0	
8	UNITED STATES DIST	RICT COL	IRT FOR THE
9	CENTRAL DISTRIC		
10			
11	L.C., a minor by and through her	Case No. 5	5:22-cv-00949-KK-SHK
12	guardian <i>ad litem</i> Maria Cadena,	II on on abl	v V anha Vina V ata
	individually and as successor-in-interest to Hector Puga; I.H., a minor by and	попогавіє	e Kenly Kiya Kato
13	through his guardian ad litem Jasmine	JOINT W	TINESS LIST
14	Hernandez, individually and as successor-in-interest to Hector Puga;		
15	A.L., a minor by and through her	FPTC:	May 15, 2025
16	guardian ad litem Lydia Lopez,	TIME:	10:30 a.m.
17	individually and as successor-in-interest to Hector Puga; and ANTONIA SALAS	CTRM:	3
18	UBALDO, individually;		
	Plaintiffs,	TRIAL:	June 2, 2025
19	VS.		
20			
21	STATE OF CALIFORNIA; COUNTY OF SAN BERNARDINO; S.S.C., a		
22	nominal defendant; ISAIAH KEE;		
23	MICHAEL BLACKWOOD;		
24	BERNARDO RUBALCAVA; ROBERT VACCARI; JAKE ADAMS; and DOES		
	6-10, inclusive,		
25	Defendants.		
26	Doronaum.		
27			

TO THE HONORABLE COURT, ALL PARTIES AND THEIR **ATTORNEYS OF RECORD:**

1

3	Pursuant to the Court's Civil Trial Scheduling Order, Plaintiffs L.C., a minor			
4	by and through her guardian <i>ad litem</i> Maria Cadena; I.H., a minor by and through			
5	his guardian ad litem Jasmine Hernandez; A.L., a minor by and through her			
6	guardian ad litem Lydia Lopez; and Antonia Salas Ubaldo ("Plaintiffs") and			
7	Defendants State of California, by and through the California Highway Patrol,			
8	Michael Blackwood, Isaiah Kee, Bernardo Rubalcava ("State Defendants"),			
9	County of San Bernardino, Robert Vaccari, and Jake Adams ("County			
10	Defendants") (collectively "the Parties"), hereby submit this Joint Exhibit List for			
11	the June 2, 2025 trial.			
12	All parties reserve the right to call any witness listed by another party.			
13				
14	DATED: April 24, 2025 LAW OFFICES OF DALE K. GALIPO			
15				
16	By/s/ Hang D. Le			
17	Dale K. Galipo Hang D. Le Attorneys for Plaintiffs			
18	Attorneys for Plaintiffs			
19				
20				
21	DATED: April 24, 2025 ROB BONTA Attorney General of California NORMAN D. MORRISON			
22	NORMAN D. MORRISON Supervising Deputy Attorney General			
23				
24	/s/ Diana Esquivel			
25	DIANA ESQUIVEL Deputy Attorney General			
26	Deputy Attorney General Attorneys for Defendant State of Cal., by and through the CHP, Blackwood, Kee, and			
27	Rubalcava			
28				

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Case	5:22-cv-00949-KK-SHK Document 162 Filed 04/24/25 Page 3 of 15 Page ID #:3948
1	
2	DATED: April 24, 2025 LYNBERG & WATKINS
3	
4	
5	By /s/ Amy R. Margolies Shannon L. Gustafson
6	Amy R. Margolies Attorneys for Defendants
7	COUNTY OF SAN BERNARDINO, ROBERT VACCARI. and JAKE ADAMS
8	
9	
10	*The filer, Hang D. Le, hereby attests that all other signatories listed, and on whose
11	behalf the filing is submitted, concur with the filing's content and have authorized
12	the filing.
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1	Witness Name	Party Calling	<u>Time:</u>	<u>Time:</u>	<u>Description of Testimony</u>
2		<u>Calling</u>	<u>Direct</u> Exam	<u>Cross</u> <u>Exam.</u>	
3			Lam		
4	1 Issish Vas	Dlaintiff	1 5 has D	4 has CD	Involvement in Decedent's
5	1. Isaiah Kee (i-zay-a key)	Plaintiff, County	1.5 hrs P	4 hrs SD .25 hrs CD	Involvement in Decedent's pursuit, stand-off &
6		Defendant		.23 IIIS CD	shooting; training &
7		& State Defendant			experience; information known to him at the time of
8					the incident; facts and
9					circumstances known to him surrounding the incident; his
10					recorded interview and
11					deposition testimony; hypothetical questions; and
12					all related liability
13					questions.
14	2. Bernardo Rubalcava	Plaintiff, County	1.5 hrs P	3 hrs SD	Involvement in Decedent's pursuit, stand-off &
15	(beh-r-NAR-	Defendant		.25 hrs CD	shooting; training &
16	doh roo-ball-	& State			experience; information
17	Kava)	Defendant			known to him at the time of the incident; facts and
18					circumstances known to him
19					surrounding the incident; his recorded interview and
20					deposition testimony;
					hypothetical questions; and all related liability
21					questions.
22	3. Michael	Plaintiff,	1.5 hrs P	3 hrs SD	Involvement in Decedent's
23	Blackwood	County		.25 hrs CD	pursuit, stand-off & shooting; training &
24	(MY-kuhl black-wood)	Defendant & State			experience; information
25	oluci wood)	Defendant			known to him at the time of
26					the incident; facts and circumstances known to him
27					surrounding the incident; his
28					recorded interview and

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1	Witness Name	Doets	Timo	Timo	Description of Testimony
	withess name	<u>Party</u> Calling	<u>Time:</u> <u>Direct</u>	<u>Time:</u> <u>Cross</u>	<u>Description of Testimony</u>
2			Exam	Exam.	
3					deposition testimony;
5					hypothetical questions; and all related liability questions.
6	4. Jake Adams	Plaintiff,	1.5 hrs P	3 hrs SD	Involvement in decedent's
7	(jayk a-	County		3 hrs CD	pursuit, stand-off &
8	duhms)	Defendant & State			shooting; training & experience; information
9		Defendant			known to him at the time of
10					the incident; facts and circumstances known to him
11					surrounding the incident; his
12					recorded interview and deposition testimony;
13					hypothetical questions; and
14					all related liability questions.
15	5. Robert	Plaintiff,	1.0 hr P	3 hrs SD	Involvement in Decedent's
16	Vaccari	County	1.0 III 1	3 hrs CD	pursuit, stand-off & use of
17	(ra-bert vak-	Defendant		3 ms CD	non-lethal force; training &
18	ka-ree),	& State Defendant			experience; information known to him at the time of
19					the incident; facts and
20					circumstances known to him surrounding the incident; his
21					recorded interview and
22					deposition testimony; hypothetical questions; and
23					all related liability
24					questions.
25	6. Jonathan Wayne	Plaintiff	.75 hr P	.75 hrs SD	Mr. Botten will testify to his observations regarding the
26	Botten, Sr.			.5 hrs CD	facts and circumstances
27					relating to the incident; injuries sustained by him
28					mjurios sustamou by min

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1 2	Witness Name	<u>Party</u> <u>Calling</u>	<u>Time:</u> <u>Direct</u> Exam	Time: Cross Exam.	Description of Testimony
3 4	(jon-uh-thuhn w-AI-n bat-		Exam		and his family members as a result of the shooting.
5	en) 7. Betzabeth	Plaintiff	0.75 hr P	0.75 hrs	Ms. Gonzalez will testify to
6 7	Gonzalez	1 iamum	0.75 III I	SD SD	her observations regarding
8	(bET-zuh- BEHTH gon- zaa-lis)			0.5 CD	the facts and circumstances relating to the incident.
9	8. Erin	Plaintiff,	0.5 hr P	0.5 hrs SD	Neighbor. Observation of
10 11	Mangerino	County Defendant		0.5 hrs CD	Puga's interaction with law enforcement & video taken.
12	(eh-ruhn mAHN-juh-	& State			Will testify to her
13	REE-no),	Defendant			observations regarding the facts and circumstances
14	9. Robert Ripley	Plaintiff &	1 hr P	1 hr SD	relating to the incident. Detective Ripley is a
15 16	(ron-urht rip-lee),	County Defendant	1 111 1	0.5 hr CD	detective for the County of San Bernardino Sheriff's
17	,,				Department and is the detective who processed the
18					scene of the incident. He will testify to his
19 20					investigation and findings of the subject scene, the
21					physical evidence obtained,
22					the documenting of evidence locations at the scene as well
23					as preparation of his report.
24	10. Timothy Jong, MD	Plaintiff, County	1 hr P	0.75 hrs SD	Performance and results of Puga's autopsy. Dr. Jong
25	(Ti-muh-thee	Defendant & State		.5 hrs CD	was the County Medical Examiner who performed
26	jONG)	Defendant			Puga's autopsy. He will
27					testify to the autopsy he performed, the external
28					<u> </u>

1	Witness Name	Party	<u>Time:</u>	Time:	Description of Testimony
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$	vvidioso ivanie	<u>Calling</u>	<u>Direct</u>	<u>Cross</u>	<u>Bescription of Testimony</u>
3			Exam	Exam.	
$\frac{1}{4}$					examination of Puga's body,
5					his observations of the wounds found on Puga's
6					body, the nature and extent
$\frac{1}{7}$					of Puga's injuries, the cause and manner of the injuries
8					found on Puga, the
9					trajectory of the gunshot wounds, the internal
10					examination of Puga's body,
11					any other autopsy findings, cause and manner of death,
12					whether gunshot wounds are
13					consistent with specific body positioning, and any
14					hypotheticals posed to him.
15	11. Roger Clark	Plaintiff	1.5 hrs P	1 hr SD	Mr. Clark is Plaintiffs'
16	(rO-juh-r klark)			1 hr CD	retained police practices expert. He will testify to his
17	Kiaik)				background, experience,
18					training and POST standards, as well as his
19					opinions regarding the
20					officers' conduct, tactics, and use of force pursuant to
21					standard police practices and
22					training, and answer any hypotheticals posed to him.
23	12. Jasmine	Plaintiff,	0.5 hr P	0.5 hr SD	Plaintiff's mother.
24	Hernandez	County		0.5 hr CD	Knowledge of Puga's
25	(jaes-min hur- nan-dez)	Defendant & State			relationship with I.H. She will testify to the
26	nan-ucz)	Defendant			relationship I.H. had with
27					his father, and the loss of love, comfort, society and
_					

1	Witness Name	<u>Party</u>	<u>Time:</u>	<u>Time:</u>	<u>Description of Testimony</u>
$2 \parallel$		<u>Calling</u>	<u>Direct</u>	<u>Cross</u> <u>Exam.</u>	
3			<u>Exam</u>	<u>DAUIII.</u>	
4					support suffered by I.H. by the loss of his father.
5	13. Lydia Lopez	Plaintiff,	0.5 hr P	0.5 hr SD	Plaintiff's mother.
6	(lIH-dee-uh	County		.5 hr CD	Knowledge of Puga's
7	lo-pez)	Defendant & State			relationship with A.L. She will testify to the
8		Defendant			relationship A.L. had with
9					her father, and the loss of love, comfort, society and
10					support suffered by A.L. by
11					the loss of her father.
12	14. Maria Cadena	*	0.5 hr P	0.5 hr SD	Plaintiff's mother. Knowledge of Puga's
13	(muh-ree-uh	County Defendant		0.5 hr CD	relationship with L.C.
$13 \parallel 14 \parallel$	ka-den-a)	& State			Ms. Lopez is the natural
		Defendant			mother and guardian ad
15					litem of Plaintiff L.C. She will testify to the
16					relationship L.C. had with
17					her father, and the loss of love, comfort, society and
18					support suffered by L.C. by
19					the loss of her father.
20	15. Antonia Salas		0.5 hr P	0.5 hr SD	Ms. Salas-Ubaldo is the
21	Ubaldo	County Defendant		0.5 hr CD	mother of Puga. She will testify to her relationship
22	(an-toh-nee- uh saa-luhs				with Puga and the loss of
23	uh-BAHL-				love, comfort, society and
24	doh)				support she suffers as a result of the loss of her son.
25	16. Gabriela	Plaintiff,	0.5 hr P	0.5 hr SD	Puga's sister. Observation
26	Salas	County Defendant		0.5 hr CD	of Puga's possession of gun & his relationship with
27	(gab-ri-ela	& State			plaintiffs She will testify to
28	sal-as)	Defendant			Ms. Salas-Ubaldo and the
		<u> </u>	1	1	

1	Witness Name	Davitas	Т:	Т:	Description of Testimone
$\frac{1}{2}$	Witness Name	<u>Party</u> <u>Calling</u>	Time:	<u>Time:</u> <u>Cross</u>	Description of Testimony
2			<u>Direct</u> Exam	Exam.	
3			<u> </u>		minor children's
4					relationships with Puga and
5					the loss of love, comfort, society and support they
6 7					suffer as a result of his death.
8	17. Arthur Miranda	County Defendant	0.2 hr CD	0.2 hr P	Neighbor, witness and 911 caller that reported seeing
9	(aR-thur mi-	Botomaunt			man with gun.
10	ran-duh)				
11	18. Nancy Juarez	County	0.25 hr	0.25 hr P	Puga's Sister
12 13	(nANE-see hOO-ah-rees)	Defendant	CD		
	19. Annabelle	County	0.5 hr CD	0.5 hr P	Neighbor. Observation of
14	Botten	Defendant	1 hr SD		Puga's interaction with law
15 16	(aN-uh-bel baut-ten)	& State Defendant			enforcement
17	20. Edward	County	1 hr CD	0.5 hr P	Neighbor. Observation of
18	Mangerino	Defendant & State	1.5 hr SD		Puga's interaction with law enforcement & video taken.
19	(ed-Werd mAHN-juh-	Defendant			emorcement & video taken.
20	REE-no)				
21	21. Tammy	County	.75 hr CD	0.5 hr P	Neighbor. Observation of
	Goodson	Defendant	1 hr SD		Puga's interaction with law
22	(ta-mee	& State Defendant			enforcement.
23	gUUD-sun)				
24	22. Alejandro Tovar	County Defendant	2 hr SD	0.5 hr P	CHP Officer. Investigation into the 4/16/21 freeway
25	(ah-leh-Hahn-	& State	.25 CD		shooting involving Puga.
26	droh tho-vahr)	Defendant			
27					

1	Witness Name	Party Calling	<u>Time:</u>	<u>Time:</u>	<u>Description of Testimony</u>
2		Calling	<u>Direct</u>	<u>Cross</u> <u>Exam.</u>	
3			<u>Exam</u>		
$_{4}\Vert$	23. J. Johnson*	County	.25 hr CD	0.25 hr P	Deputy with knowledge and
5	(Jon- suhn),	Defendant			involvement in investigating freeway shooting incident.
6	24. R. Maday*	County	.25 hr CD	0.25 hr P	CHP, Assisting Investigator
7	(Mei-dei)	Defendant			with knowledge of freeway shooting incident.
8	25. Xavier	County	.25 hr CD	0.25 hr P	CHP, Assisting Officer with
9	Rodriguez *	Defendant			knowledge of freeway
10	(ex-ZAY-vee- er or ZAY-				shooting incident.
11	vee-er roh-				
12	DREE-gehz)				
13	26. Jorge Leanos*	County	.25 hr CD	0.25 hr P	CHP, Assisting Officer with
14	(jor-geh lEE- uh-nohz)	Defendant			knowledge of freeway shooting incident.
15	27. J. Rodriguez*	County	.25 hr CD	0.25 hr P	CHP, Assisting Officer with
16	(roh-DREE-	Defendant			knowledge of freeway
17	gehz),				shooting incident.
18	28. C. Ramos*	County	.25 hr CD	0.25 hr P	CHP, Assisting Officer with
19	(rAH-mohss),	Defendant			knowledge of freeway shooting incident.
20	29. Isaac Vega *	County	.25 hr CD	0.25 hr P	Deployed spike strip during
21	(eYE-zuhk	Defendant			pursuit.
22	vay-guh),				
23	30. Kevin Henry *	County Defendant	.25 hr CD	0.25 hr P	Aviation helicopter pilot over pursuit.
24	(kEE-vin Hen- ree)	Determant			over pursuit.
25	31. Greg	County	.25 hr CD	0.25 hr D	Tactical Flight Officer. who
26	Hanrahan *	Defendant	.43 III CD	0.23 III F	broadcasted pursuit on the
27	(gR-EH-g				radio.
	Hahn-ruh-hun)				
28					

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1	Witness Name	Party	<u>Time:</u>	Time:	Description of Testimony
2		Calling	Direct	<u>Cross</u>	
3			<u>Exam</u>	Exam.	
4	32. Angelo Gibilterra *	County Defendant	.25 hr CD	0.25 hr P	Participated in investigation of incident.
5	(aN-juh-loh				
6	jee-bee-ter- rah)				
7	33. Edward	County	.25 hr CD	0.25 hr P	SBCSD Detective.
8	Hernandez *	Defendant	.23 m CD	0.23 m 1	Investigation of Puga's
9	(ed-Werd hur-	& State			shooting and findings.
10	nan-dez),	Defendant			
11	34. Scott Abernathy*	County Defendant	.25 hr CD	0.25 hr P	SBCSD Detective. Investigation of Puga's
12	(SKOT Ab-er-	Detendant			shooting and findings
13	nath-ee)				
14	35. Adrian	County	.25 hr CD	0.25 hr P	Investigator Investigations
15	Bustamante *	Defendant			Team, participated in investigation of incident.
16	(aY-dree-en boos-tah-mun-				investigation of mercent.
17	te),				
18	36. Stephanie	County	.25 hr CD	0.25 hr P	Crime Scene Specialist,
19	Seavey *	Defendant			participated in investigation of incident.
20	(stef-uh-nee see-Vee)				of merdent.
21	37. Chris	County	.25 hr CD	0.25 hr P	Crime Scene Specialist,
22	Hermosillo *	Defendant			participated in investigation
23	(kRIHS her-				of incident.
24	maw-SEE-yo)	<u> </u>	25.1 CD	0.251 D	T C C T
25	38. Lauren Laidlaw *	County Defendant	.25 hr CD	0.25 hr P	Investigations Team, responded to the incident.
26	(lOR-en or				
27	LAW-ren lAH- dlaw)				
28	<u>´</u>				

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1	Witness Name	<u>Party</u> Calling	<u>Time:</u>	<u>Time:</u> Cross	Description of Testimony
2		<u> </u>	<u>Direct</u> <u>Exam</u>	Exam.	
3	39. Andrew	County	.25 hr CD	0.25 hr P	Emergency Medical
5	Walk*	Defendant			Technician of Medic Ambulance 22 /personnel of
6	(An-droo Waak)				the San Bernardino County
7					Fire Department. First responder to incident.
8	40. D. Moreno *	County	.25 hr CD	0.25 hr P	LASO Deputy ID No.
9	(Mor-eh-no)	Defendant			622431, involved in 2-16-21 incident re Puga fleeing
10					from police.
11	41. Deputy Galindo *	County Defendant	.25 hr CD	0.25 hr P	LASO Deputy ID No. 622431, involved in 2-16-21
12	(ga-LIHN-				incident re Puga fleeing
13	doh)				from police.
14	42. Deputy Contreras *	County Defendant	.25 hr CD	0.25 hr P	LASO Deputy ID No. 622431, involved in 2-16-21
15	(kan-tre-ras)				incident re Puga fleeing
16 17					from police.
18	43. Deputy Chavez *	County Defendant	.25 hr CD	0.25 hr P	LASO Deputy ID No. 622431, involved in 2-16-21
19	(shah-vez)				incident re Puga fleeing from police.
20	44. Jeff Lewison*	<i>-</i>	.25 hr CD	0.25 hr P	Coroner Investigator Report.
21	(jef loo-uh- suhn)	Defendant			
22	45. Gabriella	County	.25 hr CD	0.25 hr P	Report of Death Worksheet,
23	Grant *	Defendant			responded to the incident.
2425	(Gah-bree-EL- uh Grant)				
26	46. Pamela	County	.25 hr CD	0.25 hr P	Autopsy Protocol and
27	Sokolik- Putnam *	Defendant			Coroner Investigation Report
28					1

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$_{1}$	Witness Name	Party	Time:	Time:	Description of Testimony
$\begin{vmatrix} 1 \\ 2 \end{vmatrix}$		<u>Calling</u>	<u>Direct</u>	Cross	<u>Bescription of Testimony</u>
3			Exam	Exam.	
4	(Pah-MEH-lah				
5	SOH-koh-lik Puh-tuh-nuhm)				
6	47. Bradley	County	.25 hr CD	0.25 hr P	Participated in Coroner
7	Coleman *	Defendant			Investigation.
8	(brad-lee kOHL-muhn)				
9	48. Tamara Paris*	County	.25 hr CD	0.25 hr P	Assistant to Forensic
10	(TA-mah-rah	Defendant			Pathologist, assisted with autopsy.
11	or Tuh-MAH- ruh Per-is)				autopoj.
12	49. Erin A.	County	.25 hr CD	0.25 hr P	Forensic Toxicologist who
13	Spargo Ph.D *	Defendant & State	1hr SD		performed and obtained results of toxicology
14	(Eh∙ruhn SPAR-go)	Defendant			tests/report
15	-				
16	50. Jamie Cimino*	County Defendant	.25 hr CD	0.25 hr P	DDA San Bernardino
17	(jAY-mee chi-	Defendant			County District Attorney's Office
18	mee-no)				
19	51. David Steele *	County	.25 hr CD	0.25 hr P	Senior DA Investigator, San
20	(dAY-vid stee-	Defendant			Bernardino County District Attorney's Office
21	1)				·
22	52. Lucien C. "Luke" Haag	County Defendant	1.5 hr CD	1 hr P	Expert opinion on ballistics & trajectories.
23	(loo-sheen	& State	2 hr SD		a aujocionos.
24	"Lu-k" Hah-	Defendant			
25	ch)				
26	53. Kenneth L. Hubbs	County Defendant	3 hr CD	1.5 hrs P	Defense Expert Police Practice.
27	<u> </u>				

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1	Witness Name	Party Calling	<u>Time:</u>	<u>Time:</u>	<u>Description of Testimony</u>
2		Calling	<u>Direct</u> Exam	<u>Cross</u> <u>Exam.</u>	
3	(KEN-ith Hu-		Exam		
4	hbs),				
5	54. Alexander	County	3 hr CD	1.5 hrs P	Expert opinion on crime
6	Jason	Defendant & State	2 hr SD		scene reconstruction.
7	(al-ehk- SAHN-der	Defendant			
8	JAY-sahn)				
9	55. Kris	County	2 hr CD	1 hr P	Expert opinion on "suicide
10	Mohandie PH.D.	Defendant & State	2 hr SD		by cop".
11	(kris moh-ahn-	Defendant			
12	dee or mah- ahn-dee)				
13	56. Richard	County	.75 hr CD	0.5 hr P	Expert opinion of Puga's
14	Franklin Clark,	Defendant	2hr SD		intoxication.
15	Jr., M.D.	& State Defendant			
16	(rih-churd frang-kluhn	Defendant			
17	klark)				
18	57. Joshua Peter	County	.75 hr CD	0.5 hr P	Expert opinion of Puga's
19	Visco, Esq.	Defendant & State	2hr SD		pending & anticipated criminal charges.
20	(jAH-shuh- wuh pee-tr	Defendant			Crimmar Charges.
21	vees-ko)				
22	58. Kirk	County	1 hr CD	0.5 hr P	Criminalist II San
23	Garrison*	Defendant			Bernardino County Sheriff's Department – Puga gun
24	(kurk geh-ruh-sn),				analysis
25	59. Custodian of	County	.5 hr CD	0.25 hr P	Foundation/authenticity re
26	Records from	Defendant		0.23 III I	Records from the Sheriff's
27	the Sheriff's				Department for audio and
$\begin{bmatrix} 27 \\ 28 \end{bmatrix}$	Department for audio and				video recordings
ال ۵	more with				<u>I</u>

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1	Witness Name	<u>Party</u>	<u>Time:</u>	<u>Time:</u>	<u>Description of Testimony</u>
2		<u>Calling</u>	<u>Direct</u>	<u>Cross</u> Exam.	
3			<u>Exam</u>	<u>DAUII.</u>	
4	video recordings*				
5	60. Custodian of	County	.5 hr CD	0.25 hr P	Foundation/authenticity re
6	Records from	Defendant			Records from CHP for audio
7	CHP for audio and video				and video recordings
$_{8}\ $	recordings*				
9	61. Custodian of	County	.5 hr CD	0.25 hr P	Foundation/authenticity re
10	Records for	Defendant			subpoenaed records
	Subp. Records*				
11	62. Greg Meyer	State	4 hrs SD	1.5 hr P	Expert opinion on police
12	(g-r-eh-g my-	Defendant	1 hr CD	1.5 111 1	practices; reasonableness of
13	er)				State Defs.' use of force
14	63. Salvador	State	2 hrs SD	0.5 hr P	Victim witness. Interaction
15	Hernandez Pacheco	Defendant			with Puga on 4/16/21 and
16	(sal-ba-door				resulting freeway shooting
17	her-nan-dez				
	pa-che-ko)	G	11 00	0.71 D	D 11 F 1 C
18	64. Jeremy Pedergraft	State Defendant	1 hr SD	0.5 hr P	Paramedic. Examination of Puga & declared him dead at
19	(jer- e-mi	Berendunt			scene
20	ped-er-graft)				
21	65. A. McAllister	State Defendant	2 hrs SD	0.5 hr P	CHP MAIT Investigator. Investigation of Puga's
22	(mak-al-ister)	Defendant			shooting and findings.
23	66. J. Carter	State	2 hrs SD	0.5 hr P	CHP MAIT Team Leader.
24	(kart-er)	Defendant			Investigation of Puga's shooting and findings.
25					

^{*} Any witness with an asterisk (*) is only to be called if there is an evidentiary dispute.

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